

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

EASTERN PROFIT CORPORATION
LIMITED,

Plaintiff,

V.

STRATEGIC VISION US, LLC,

Defendant.

Case No. 18-CV-2185 (LJL)

**DECLARATION OF JOANNA J. CLINE IN SUPPORT OF PLAINTIFF EASTERN
PROFIT CORPORATION LIMITED BILL OF COSTS**

I, Joanna J. Cline, declare:

1. I am an attorney at Troutman Pepper Hamilton Sanders LLP, and counsel of record for Eastern Profit Corporation Limited (“Eastern”) in this litigation. I am admitted to practice in Delaware, New Jersey, and Pennsylvania, and I am admitted to this Court *pro hac vice*.

2. I submit this declaration in support of Eastern's Bill of Costs.

3. In the above-captioned case, Eastern asserted claims for breach of contract, a declaratory judgment, and unjust enrichment. Strategic Vision US, LLC (“Strategic”) asserted counterclaims for breach of contract and fraudulent inducement.

4. The Court held an in-person bench trial, overseen by Judge Liman, which commenced on April 19, 2021, and concluded on April 22, 2021.

5. The parties delivered their closing statements to the Court, remotely, on April 30, 2021.

6. The Court entered judgment in favor of Eastern and against Strategic on Count III (Declaratory Judgment) of Eastern's Second Amended Complaint, Count I (Breach of Contract) of Strategic's Counterclaims, and Count II (Fraud) of Strategic's Counterclaims. Dkt. No. 377.

7. Eastern's Bill of Costs totals \$23,616.47.

8. Attached as **Exhibit A** are true and correct copies of invoices for original trial transcripts, taxable under L. R. 54.1(c)(1). These are the costs of such transcripts paid by Eastern (and do not include the costs of such transcripts paid by Strategic or other parties). These transcripts were necessary for trial in this case and were used to prepare witnesses and to prepare for the presentation of evidence. These transcripts were not obtained solely for the convenience of counsel.

EXHIBIT A. FEES OF THE COURT REPORTER FOR ALL OR ANY PART OF THE TRIAL TRANSCRIPTS NECESSARILY OBTAINED FOR USE IN THE CASE (taxable pursuant to Local Rule 54.1(c)(1))		
Date	Invoice Number / Description	Total Costs
4/19/2021 Transcript	0532383-IN	\$1,028.16
4/20/2021 Transcript	0532382-IN	\$1,110.78
4/21/2021 Transcript	0532381-IN	\$830.79
4/22/2021 Transcript	0532380-IN	\$766.53
4/30/2021 Transcript	0532633-IN	\$367.20
Fees paid to Southern District Court Reporters, Inc. for the cost of original trial transcripts necessarily obtained for use in this case.		
REQUESTED SUBTOTAL COST(S):		\$4,103.46

9. Attached as **Exhibit B** are true and correct copies of invoices for original trial deposition transcripts, taxable under L. R. 54.1(c)(2). These are the costs of such transcripts paid by Eastern (and do not include the costs of such transcripts paid by Strategic or other parties).

These transcripts include deposition transcripts for the following witnesses who testified live at trial and whose depositions were used at trial or were otherwise reasonably necessary to the parties at the time they were taken: Mr. William Gertz (fact witness), Ms. Sasha Gong (fact witness), Chunguang Han (fact witness), Lianchao Han (fact witness), Karin Maistrello (fact witness), J. Michael Waller (fact and 30(b)(6) witness), French Wallop (fact and 30(b)(6) witness), Yvette Wang (fact witness), and Guo Wengui (fact witness).

EXHIBIT B. FEES OF THE COURT REPORTER FOR ALL OR ANY PART OF THE DEPOSITION TRANSCRIPTS NECESSARILY OBTAINED FOR USE IN THE CASE (taxable pursuant to Local Rule 54.1(c)(2))				
Deponent	Date	Vendor	Invoice No.	Total Invoice
William Gertz	10/15/2019	Atkinson-Baker, Inc.	AD07998 AB	\$545.20
William Gertz	10/15/2019	Atkinson-Baker, Inc.	1AED3	\$160.00
Sasha Gong	11/26/2019	Alaris Litigation Services	115200	\$939.80
Chunguang Han	11/11/2019	Atkinson-Baker, Inc.	AD0B4F6 AB	\$673.05
Lianchao Han	8/28/2019	Atkinson-Baker, Inc.	1ADE2 B	\$335.00
Karin Maistrello	8/23/2019	Atkinson-Baker, Inc.	1B108 B	\$135.00
J. Michael Waller	2/8/2019	Huseby Inc.	556705	\$1,464.97
J. Michael Waller (30(b)(6))	11/19/2019	Veritext, LLC	NY4071791	\$1,696.44
J. Michael Waller (30(b)(6))	11/19/2019	Veritext, LLC	NY4095725	\$1,258.75
French Wallop	2/12/2019	Huseby Inc.	557949	\$2,369.48
French Wallop (30(b)(6))	11/19/2019	Veritext, LLC	NY4071791	\$1,037.43
French Wallop (30(b)(6))	11/19/2019	Veritext, LLC	NY4095725	\$1,475.75
Yvette Wang	10/30/2019	Atkinson-Baker, Inc.	AD0ABD6 AB	\$1,602.25
Yvette Wang	10/30/2019	Atkinson-Baker, Inc.	1B778	\$322.50
Guo Wengui	8/2/2019	Atkinson-Baker, Inc.	1AEA2 B	\$992.50
Guo Wengui	12/4/2019	Atkinson-Baker, Inc.	AD0BC41 AB	\$582.00
Guo Wengui	12/4/2019	Atkinson-Baker, Inc.	1BA29 B	\$222.50
REQUESTED SUBTOTAL COST(S):				\$15,812.62

10. Attached as **Exhibit C** are true and correct copies of invoices for interpretation costs associated with witnesses presented in connection with Eastern's claims as well as excerpts of trial transcripts on each day these witnesses testified with interpretation assistance, taxable under L. R. 54.1(c)(4). The fee of each witness involved is taxable pursuant to L. R. 54.1(c)(3).

EXHIBIT C. WITNESS FEES (INTERPRETATION) (taxable pursuant to Local Rule 54.1(c)(4))				
Witness Name	Date	Vendor	Invoice No.	Total Invoice
Han Chunguang	4/20/2021 – 4/22/2021	Una Wilkinson	GK06521	\$2,972.42
Kwok Ho Wan				
Guo Wengui				
REQUESTED SUBTOTAL COST(S):				\$2,972.42

11. Attached as **Exhibit D** are true and correct copies of invoices for exemplification and copies of exhibits for use at trial, taxable under L. R. 54.1(c)(5). I declare that the following are entries from Reliable Inc. for the preparation of demonstratives for use during trial or a support person in the courtroom to display the exhibits or demonstratives during the trial relating to Eastern's claims.

EXHIBIT D. FEES FOR EXEMPLIFICATION AND COPIES OF PAPERS NECESSARILY OBTAINED FOR USE IN THE CASE (taxable pursuant to Local Rule 54.1(c)(5))				
Date	Vendor	Description	Invoice No.	Total Costs
10/8/2020	Reliable Inc.	Three copies of all deposition transcripts used at trial	PH217415	\$317.97
REQUESTED SUBTOTAL COST(S):				\$317.97


12. Attached as **Exhibit E** are true and correct copies of invoices for fees of the clerk and miscellaneous fees, taxable under L. R. 54.1(c)(10).

EXHIBIT E. DOCKET AND MISCELLANEOUS FEES (taxable pursuant to Local Rule 54.1(c)(10))			
Date	Docket No.	Description	Total Costs
3/12/2018	19	Filing fee for Complaint against Strategic Vision US LLC (originally filed under seal); refiled on 8/9/2018 as Docket No. 19	\$400.00
1/9/2020	240	Pacer fees for obtaining copies of letters filed by Eastern Profit Corporation	\$10.00
REQUESTED SUBTOTAL COST(S):			\$410.00

Dated: August 13, 2021

Respectfully submitted,

TROUTMAN PEPPER HAMILTON
SANDERS LLP
1313 North Market Streets, Suite 5100
Wilmington, DE 19801
302.777.6500
302.421.8390 (facsimile)

By: 

Joanna J. Cline
Attorneys for Plaintiff

EXHIBIT A

Invoice**SOUTHERN DISTRICT REPORTERS PC****Tax ID No. 13-2775946**

500 Pearl St.
 Room 330
 New York, NY 10007
 Tel No. (212) 805-0300

INVOICE NO.: 0532383-IN

INVOICE DATE: 04/27/21

CUSTOMER NO.: 1028571

WORK ORDER NO.: 220297

SALESPERSON: CSIW

Troutman,Pepper,Hamilton,Sande
 1313 N Market Street
 Suite 5100
 Wilmington, DE 19801
 Attention:Joanna Cline

PAID INVOICE

JOB DATE EASTERN PROFIT CORP, LTD V STRATEGIC VIS

CASE NO. **18CV02185**

4/19/2021	Original	224.00	Pages at	\$4.59	1,028.16
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Net Invoice:	1,028.16
Less Discount:	0.00
Freight:	0.00
Sales Tax:	0.00
Invoice Total:	1,028.16

Less Deposit:	1,028.16
Invoice Balance:	0.00

Invoice**SOUTHERN DISTRICT REPORTERS PC****Tax ID No. 13-2775946**

500 Pearl St.
 Room 330
 New York, NY 10007
 Tel No. (212) 805-0300

INVOICE NO.: 0532382-IN

INVOICE DATE: 04/27/21

CUSTOMER NO.: 1028571

WORK ORDER NO.: 220298

SALESPERSON: CSIW

Troutman,Pepper,Hamilton,Sande
 1313 N Market Street
 Suite 5100
 Wilmington, DE 19801
 Attention:Joanna Cline

PAID INVOICE

JOB DATE EASTERN PROFIT CORP, LTD V STRATEGIC VIS

CASE NO. **18CV02185**

4/20/2021	Original	242.00	Pages at	\$4.59	1,110.78
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Net Invoice:	1,110.78
Less Discount:	0.00
Freight:	0.00
Sales Tax:	0.00
Invoice Total:	1,110.78

Less Deposit: 1,110.78
Invoice Balance: 0.00

Invoice**SOUTHERN DISTRICT REPORTERS PC****Tax ID No. 13-2775946**

500 Pearl St.
 Room 330
 New York, NY 10007
 Tel No. (212) 805-0300

INVOICE NO.: 0532381-IN

INVOICE DATE: 04/27/21

CUSTOMER NO.: 1028571

WORK ORDER NO.: 220299

SALESPERSON: CSIW

Troutman,Pepper,Hamilton,Sande
 1313 N Market Street
 Suite 5100
 Wilmington, DE 19801
 Attention:Joanna Cline

***PAID INVOICE ***

 JOB DATE EASTERN PROFIT CORP, LTD V STRATEGIC VIS
CASE NO. **18CV02185**

4/21/2021	Original	181.00	Pages at	\$4.59	830.79
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Net Invoice:	830.79
Less Discount:	0.00
Freight:	0.00
Sales Tax:	0.00
Invoice Total:	830.79

Less Deposit: 830.79
Invoice Balance: 0.00

Invoice**SOUTHERN DISTRICT REPORTERS PC****Tax ID No. 13-2775946**

500 Pearl St.
 Room 330
 New York, NY 10007
 Tel No. (212) 805-0300

INVOICE NO.: 0532380-IN

INVOICE DATE: 04/27/21

CUSTOMER NO.: 1028571

WORK ORDER NO.: 220300

SALESPERSON: CSIW

Troutman,Pepper,Hamilton,Sande
 1313 N Market Street
 Suite 5100
 Wilmington, DE 19801
 Attention:Joanna Cline

***PAID INVOICE**

JOB DATE EASTERN PROFIT CORP, LTD V STRATEGIC VIS

CASE NO. **18CV02185**

4/22/2021	Original	167.00	Pages at	\$4.59	766.53
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Net Invoice:	766.53
Less Discount:	0.00
Freight:	0.00
Sales Tax:	0.00
Invoice Total:	766.53

Less Deposit: _____ 766.53
Invoice Balance: _____ 0

Invoice**SOUTHERN DISTRICT REPORTERS PC****Tax ID No. 13-2775946**

500 Pearl St.
 Room 330
 New York, NY 10007
 Tel No. (212) 805-0300

INVOICE NO.: 0532633-IN

INVOICE DATE: 05/06/21

CUSTOMER NO.: 1028571

WORK ORDER NO.: 220498

SALESPERSON: CSIW

Troutman,Pepper,Hamilton,Sande
 1313 N Market Street
 Suite 5100
 Wilmington, DE 19801
 Attention:Joanna Cline

PAYMENT IS DUE UPON RECEIPT

 JOB DATE EASTERN PROFIT CORP, LTD V STRATEGIC VIS
CASE NO. **18CV02185**

4/30/2021	Original	80.00	Pages at	\$4.59	367.20
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Net Invoice:	367.20
Less Discount:	0.00
Freight:	0.00
Sales Tax:	0.00
Invoice Total:	367.20

WE ACCEPT VISA, MASTERCARD, AMERICAN EXPRESS AND DISCOVER
PLEASE MAKE CHECK PAYABLE TO SOUTHERN DISTRICT REPORTERS PC

Less Deposit: _____
Invoice Balance:

EXHIBIT B

ATKINSON-BAKER, INC.
 500 NORTH BRAND BOULEVARD, THIRD FLOOR
 GLENDALE, CA 91203-4725
 800-288-3376, 800-925-5910 fax
 www.depo.com

Joanna Cline
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

INVOICE NO.	AD07998 AB
FIRM NO.	0129201
INVOICE DATE	10/25/2019

Please refer to the Invoice No. and your Firm No. in any correspondence.
 Contact Nicole Hou
 nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC

Taking Attorney:

Case Name: Eastern Profit vs. Strategic Vision

Case No.: 18-cv-2185

Description: Certified copy of the reporter's transcript of the deposition of Bill Gertz, taken 10/15/2019.

ITEM	QTY	PRICE	LINE TOTAL
Copy Pages - Business Rate	187.00	\$ 2.50	\$ 467.50
Exhibits (pages)	14.00	\$.55	\$ 7.70
Litigation Support Package - Copy	1.00	\$ 25.00	\$ 25.00
Processing & Handling Fee - Copy	1.00	\$ 45.00	\$ 45.00
BALANCE DUE			\$ 545.20

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

----- Fold and tear at this perforation, then return stub with payment. -----

BALANCE DUE	\$ 545.20
INVOICE NO.	AD07998 AB
FIRM NO.	0129201

For: Certified copy of the reporter's transcript of the deposition of Bill Gertz, taken 10/15/2019.

From: Joanna Cline
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

Remit To: Atkinson-Baker, Inc.
 500 NORTH BRAND BOULEVARD,
 THIRD FLOOR
 GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.

ATKINSON-BAKER, INC.
 500 NORTH BRAND BOULEVARD, THIRD FLOOR
 GLENDALE, CA 91203-4725
 800-288-3376, 800-925-5910 fax
 www.depo.com

Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

INVOICE NO. 1AED3 B
 FIRM NO. 0129201
 INVOICE DATE 11/07/2019

Please refer to the Invoice No. and your Firm No. in any correspondence. Contact
 Nicole Hou, nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney: Edward D. Greim
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185

Description: MP4 Files for the deposition of Bill Gertz taken
 10/15/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 Files	2.5	\$ 50.00	\$ 125.00
Processing & handling	1	\$ 35.00	\$ 35.00
BALANCE DUE			\$ 160.00

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

Fold and tear at this perforation, then return stub with payment.

BALANCE DUE	\$ 160.00
INVOICE NO.	1AED3 B
FIRM NO.	0129201

For: MP4 Files for the deposition of Bill Gertz
 taken 10/15/2019.

From: Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

Remit To: Atkinson-Baker, Inc.
 500 NORTH BRAND BOULEVARD,
 THIRD FLOOR
 GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.

INVOICE

Joanna Cline
Pepper Hamilton LLP
PO Box 1709
Hercules Plaza Suite 5100
1313 Market Street
Wilmington, DE 19899

Invoice No.	Invoice Date	Job No.
115200	12/17/2019	84066
Job Date	Case No.	
11/26/2019	18CV2185JGK	
Case Name		
Eastern Profit Corporation Limited v Strategic Vision US LLC		
Payment Terms		
Net 30, After 30 Add 1.5% Finance Charge		

1 CERTIFIED COPY OF TRANSCRIPT OF:

Sasha Gong	260.00	Page	@	2.00	520.00
Archive				7.50	7.50
Transcript - Rough ASCII	217.00	Page	@	1.90	412.30
TOTAL DUE >>>					\$939.80

Deposition held in Washington, DC

slm

Tax ID: 43-1699962

Please detach bottom portion and return with payment.

Joanna Cline
Pepper Hamilton LLP
PO Box 1709
Hercules Plaza Suite 5100
1313 Market Street
Wilmington, DE 19899

Invoice No. : 115200
Invoice Date : 12/17/2019
Total Due : \$939.80

Remit To: **Alaris Litigation Services**
800-280-3376
P.O. Box 66936
Saint Louis, MO 63166-6936

Job No. : 84066
BU ID : KC
Case No. : 18CV2185JGK
Case Name : Eastern Profit Corporation Limited v Strategic Vision US LLC

ATKINSON-BAKER, INC.
 500 NORTH BRAND BOULEVARD, THIRD FLOOR
 GLENDALE, CA 91203-4725
 800-288-3376, 800-925-5910 fax
 www.depo.com

Chris Chuff
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

Please refer to the Invoice No. and your Firm No. in any correspondence.
 Contact Nicole Hou
 nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney:
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185 (JGK)

INVOICE NO.	AD0B4F6 AB
FIRM NO.	1211636
INVOICE DATE	12/11/2019

ITEM	LINE TOTAL
Certified copy of the reporter's transcript of the deposition of Han Chunguang, taken 11/11/2019.	\$ 673.05
BALANCE DUE	\$ 673.05

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

----- Fold and tear at this perforation, then return stub with payment. -----

BALANCE DUE	\$ 673.05
--------------------	------------------

For: Certified copy of the reporter's transcript of the deposition of Han Chunguang, taken 11/11/2019.

INVOICE NO.	AD0B4F6 AB
FIRM NO.	1211636

From: Chris Chuff
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

Remit To: Atkinson-Baker, Inc.
 500 NORTH BRAND BOULEVARD,
 THIRD FLOOR
 GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.

ATKINSON-BAKER, INC.
 500 NORTH BRAND BOULEVARD, THIRD FLOOR
 GLENDALE, CA 91203-4725
 800-288-3376, 800-925-5910 fax
 www.depo.com

Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

INVOICE NO. 1AED2 B
 FIRM NO. 0129201
 INVOICE DATE 11/07/2019

Please refer to the Invoice No. and your Firm No. in any correspondence. Contact
 Nicole Hou, nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney: Edward D. Greim
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185

Description: MP4 Files for the deposition of Lianchao Han
 taken 8/28/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 files	6	\$ 50.00	\$ 300.00
Processing & handling	1	\$ 35.00	\$ 35.00
BALANCE DUE			\$ 335.00

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

Fold and tear at this perforation, then return stub with payment.

BALANCE DUE	\$ 335.00
INVOICE NO.	1AED2 B
FIRM NO.	0129201

For: MP4 Files for the deposition of Lianchao Han
 taken 8/28/2019.

From: Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

Remit To: Atkinson-Baker, Inc.
 500 NORTH BRAND BOULEVARD,
 THIRD FLOOR
 GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.

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 www.depo.com

Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

INVOICE NO. 1AED2 B
 FIRM NO. 0129201
 INVOICE DATE 11/07/2019

Please refer to the Invoice No. and your Firm No. in any correspondence. Contact
 Nicole Hou, nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney: Edward D. Greim
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185

Description: MP4 Files for the deposition of Lianchao Han
 taken 8/28/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 files	6	\$ 50.00	\$ 300.00
Processing & handling	1	\$ 35.00	\$ 35.00
BALANCE DUE			\$ 335.00

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

Fold and tear at this perforation, then return stub with payment.

BALANCE DUE	\$ 335.00
INVOICE NO.	1AED2 B
FIRM NO.	0129201

For: MP4 Files for the deposition of Lianchao Han
 taken 8/28/2019.

From: Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

Remit To: Atkinson-Baker, Inc.
 500 NORTH BRAND BOULEVARD,
 THIRD FLOOR
 GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.

ATKINSON-BAKER, INC.
 500 NORTH BRAND BOULEVARD, THIRD FLOOR
 GLENDALE, CA 91203-4725
 800-288-3376, 800-925-5910 fax
 www.depo.com

Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

INVOICE NO. 1B108 B
 FIRM NO. 0129201
 INVOICE DATE 11/07/2019

Please refer to the Invoice No. and your Firm No. in any correspondence. Contact
 Nicole Hou, nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney: Edward D. Greim
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185

Description: MP4 Files for the deposition of Karin Maistrello
 taken 8/23/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 Files	2	\$ 50.00	\$ 100.00
Processing & handling	1	\$ 35.00	\$ 35.00
BALANCE DUE			\$ 135.00

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

Fold and tear at this perforation, then return stub with payment.

BALANCE DUE	\$ 135.00
INVOICE NO.	1B108 B
FIRM NO.	0129201

For: MP4 Files for the deposition of Karin
 Maistrello taken 8/23/2019.

From: Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

Remit To: Atkinson-Baker, Inc.
 500 NORTH BRAND BOULEVARD,
 THIRD FLOOR
 GLENDALE, CA 91203-4725

If you have already paid for this service by COD, then this invoice is for your records only.



Huseby.com

Corporate Headquarters
1230 West Morehead St., Suite 408
Charlotte, NC 28208
Questions? Call (800) 333-2082

Zachary Grendi, Esq.
Zeichner, Ellman & Krause LLP
35 Mason St
Greenwich, CT 06830



INVOICE

Invoice No.	Invoice Date	Job No.
556705	2/22/2019	224394
Job Date	Case No.	
2/8/2019	18-CV-2185 (JGK)	
Case Name		
Eastern Profit Corporation Limited v. Strategic Vision US, LLC		
Payment Terms		
Due upon receipt, after 30 days 1.5% fee		

Video Services

J. Michael Waller
SALES TAX

1,377.50

87.47

ENTERED

TOTAL DUE >>>

\$1,464.97

Thank you for choosing Huseby!

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Zeichner, Ellman & Krause LLP
35 Mason St
Greenwich, CT 06830

912158-001
286
APPROVED BY

Job No. : 224394 BU ID : Brandon
Case No. : 18-CV-2185 (JGK)
Case Name : Eastern Profit Corporation Limited v. Strategic Vision US, LLC
Invoice No. : 556705 Invoice Date : 2/22/2019
Total Due : \$1,464.97

PAYMENT WITH CREDIT CARD



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Amount to Charge:

Cardholder's Signature:

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Zachary Grendi, Esq.
Zeichner, Ellman & Krause LLP
35 Mason St
Greenwich, CT 06830

Invoice No.	Invoice Date	Job No.
557949	2/26/2019	229400
Job Date	Case No.	
2/12/2019	18-CV-2185 (JGK)	
Case Name		
Eastern Profit Corporation Limited v. Strategic Vision US, LLC		
Payment Terms		
Due upon receipt, after 30 days 1.5% fee		

ORIGINAL TRANSCRIPT OF:

French Wallop

Full Day Per Diem

SALES TAX

2,108.00

120.00 120.00

141.48

TOTAL DUE >>>**\$2,369.48**

ENTERED

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Zachary Grendi, Esq.
Zeichner, Ellman & Krause LLP
35 Mason St
Greenwich, CT 06830

9/21/58-001
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ZBL

Job No. : 229400 BU ID : Brandon
Case No. : 18-CV-2185 (JGK)
Case Name : Eastern Profit Corporation Limited v. Strategic Vision US, LLC
Invoice No. : 557949 Invoice Date : 2/26/2019
Total Due : \$2,369.48

PAYMENT WITH CREDIT CARD

Cardholder's Name:

Card Number:

Exp. Date:

Phone#:

Billing Address:

Zip:

Card Security Code:

Amount to Charge:

Cardholder's Signature:

Email:

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Veritext, LLC
New York Region

330 Old Country Rd., Suite 300
 Mineola NY 11501
 Tel. (516) 608-2400 Fax. (516) 608-2450
 Fed. Tax ID: 20-3132569



Bill To: Joanna Cline
 Pepper Hamilton, LLP
 1313 N Market St
 Suite 5100
 Wilmington, DE, 19899

Invoice #: NY4071791
Invoice Date: 12/11/2019
Balance Due: \$2,733.87

Case: Eastern Profit Corporation Limited v. Strategic Vision US, LLC
Job #: 3774654 | Job Date: 11/19/2019 | Delivery: Normal
Billing Atty: Joanna Cline
Location: Clyde & Co
 405 Lexington Avenue - 16th Floor | The Chrysler Building
 New York, NY 10174
Sched Atty: Joanna Cline | Pepper Hamilton, LLP

Witness	Description	Units	Quantity	Price	Amount
(John) Michael Waller	Original with 1 Certified Transcript	Page	223.00	\$4.75	\$1,059.25
	Rough Draft	Page	223.00	\$2.00	\$446.00
	Realtime Services	Page	223.00	\$2.30	\$512.90
	Realtime Services	Page	223.00	\$2.30	\$512.90
	Litigation Package (all Electronic Files)	1	1.00	\$46.00	\$46.00
	Exhibits Scanned-Searchable - OCR	Per Page	124.00	\$0.35	\$43.40
French Wallop , 30(b)(6)	Original with 1 Certified Transcript	Page	129.00	\$4.75	\$612.75
	Realtime Services	Page	129.00	\$2.30	\$296.70
	Rough Draft	Page	129.00	\$2.00	\$258.00
	Realtime Services	Page	129.00	\$2.30	\$296.70
	Litigation Package (all Electronic Files)	1	1.00	\$46.00	\$46.00
	Exhibits Scanned-Searchable - OCR	Per Page	54.00	\$0.35	\$18.90
	Attendance Fee	1	2.00	\$75.00	\$150.00
	Shipping & Handling	Package	1.00	\$53.57	\$53.57

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Invoice #: NY4071791
Job #: 3774654
Invoice Date: 12/11/2019
Balance: \$2,733.87

Veritext, LLC
New York Region

330 Old Country Rd., Suite 300
 Mineola NY 11501
 Tel. (516) 608-2400 Fax. (516) 608-2450
 Fed. Tax ID: 20-3132569



Notes:	Invoice Total:	\$4,353.07
	Payment:	\$0.00
	Credit:	(\$1,619.20)
	Interest:	\$0.00
	Balance Due:	\$2,733.87
TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information		

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Invoice #: NY4071791
Job #: 3774654
Invoice Date: 12/11/2019
Balance: \$2,733.87

Veritext, LLC
New York Region

330 Old Country Rd., Suite 300
 Mineola NY 11501
 Tel. (516) 608-2400 Fax. (516) 608-2450
 Fed. Tax ID: 20-3132569



Bill To: Joanna Cline
 Pepper Hamilton, LLP
 100 Market St
 Suite 200
 Harrisburg, PA, 17101

Invoice #: NY4095725
Invoice Date: 12/17/2019
Balance Due: \$2,734.50

Case: Eastern Profit Corporation Limited v. Strategic Vision US, LLC
Job #: 3774654 | Job Date: 11/19/2019 | Delivery: Normal
Billing Atty: Joanna Cline
Location: Clyde & Co
 405 Lexington Avenue - 16th Floor | The Chrysler Building
 New York, NY 10174
Sched Atty: Joanna Cline | Pepper Hamilton, LLP

Witness	Description	Units	Quantity	Price	Amount
(John) Michael Waller	Video - Media and Cloud Services	Per disk	3.00	\$42.00	\$126.00
	Video - Digitizing & Transcript Synchronization	Hour	3.50	\$175.00	\$612.50
French Wallop , 30(b)(6)	Video - Media and Cloud Services	Per disk	2.00	\$42.00	\$84.00
	Video - Digitizing & Transcript Synchronization	Hour	2.50	\$175.00	\$437.50
	Video - Initial Fee	1	1.00	\$350.00	\$350.00
	Video - Additional Hours	Hour	7.00	\$155.00	\$1,085.00
	Shipping & Handling - Video Media	Package	1.00	\$39.50	\$39.50
Notes:				Invoice Total:	\$2,734.50
				Payment:	\$0.00
				Credit:	\$0.00
				Interest:	\$0.00
				Balance Due:	\$2,734.50
TERMS: Payable upon receipt. Accounts 30 days past due will bear a finance charge of 1.5% per month. Accounts unpaid after 90 days agree to pay all collection costs, including reasonable attorney's fees. Contact us to correct payment errors. No adjustments will be made after 90 days. For more information on charges related to our services please consult http://www.veritext.com/services/all-services/services-information					

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Invoice #: NY4095725
Job #: 3774654
Invoice Date: 12/17/2019
Balance: \$2,734.50

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Joanna Cline
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

INVOICE NO.	AD0ABD6 AB
FIRM NO.	1211636
INVOICE DATE	11/05/2019

Please refer to the Invoice No. and your Firm No. in any correspondence.
 Contact Nicole Hou
 nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney: Edward D. Greim
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185 (JGK)

Description: Certified copy of the reporter's transcript of the deposition of Yvette Wang, taken 10/30/2019. Expedited.

ITEM	QTY	PRICE	LINE TOTAL
Copy Pages - Business Rate	227.00	\$ 3.75	\$ 851.25
Expedite: 3 working days - 80%	227.00	\$ 3.00	\$ 681.00
Litigation Support Package - Copy	1.00	\$ 25.00	\$ 25.00
Processing & Handling Fee - Copy	1.00	\$ 45.00	\$ 45.00
BALANCE DUE			\$ 1,602.25

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BALANCE DUE	\$ 1,602.25
INVOICE NO.	AD0ABD6 AB
FIRM NO.	1211636

For: Certified copy of the reporter's transcript of the deposition of Yvette Wang, taken 10/30/2019. Expedited.

From: Joanna Cline
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

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Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

INVOICE NO. 1B778 B
 FIRM NO. 0129201
 INVOICE DATE 11/07/2019

Please refer to the Invoice No. and your Firm No. in any correspondence. Contact
 Nicole Hou, nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm: Graves Garrett, LLC
 Taking Attorney: Edward D. Greim
 Case Name: Eastern Profit vs. Strategic Vision
 Case No.: 18-cv-2185 (JGK)

Description: MP4 Video Files for the deposition of Yvette Wang
 taken 10/30/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 Video Files	5.75	\$ 50.00	\$ 287.50
Processing & handling	1	\$ 35.00	\$ 35.00
BALANCE DUE			\$ 322.50

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If Atkinson-Baker, Inc. deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

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BALANCE DUE	\$ 322.50
INVOICE NO.	1B778 B
FIRM NO.	0129201

For: MP4 Video Files for the deposition of Yvette Wang taken 10/30/2019.

From: Mary Walsh
 Pepper Hamilton LLP
 3000 Two Logan Square
 Eighteenth and Arch Streets
 Philadelphia, PA 19103-2799

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Amelia Coluccio
 Golden Spring (New York) Limited
 162 East 64th Street
 New York, NY 10065-

INVOICE NO.	1AEA2 B
FIRM NO.	1262079
INVOICE DATE	08/15/2019

Please refer to the Invoice No. and your Firm No. in any correspondence.
 Contact Nicole Hou, nhou@depo.com

Federal Tax ID No.: 20-3132569

Setting Firm: Graves Garrett, LLC

Taking Attorney:

Case Name: Eastern Profit vs. Strategic Vision

Case No.: 18-cv-2185

Description: MP4 Video Files for the deposition of Guo Wengui taken 8/2/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 - Upload RUSH	7.25	\$ 130.00	\$ 942.50
Processing and handling	1	\$ 50.00	\$ 50.00
PAYMENT			- \$ 992.50
BALANCE DUE			\$.00

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BALANCE DUE	\$.00
INVOICE NO.	1AEA2 B
FIRM NO.	1262079

For: MP4 Video Files for the deposition of Guo Wengui taken 8/2/2019.

From: Amelia Coluccio
 Golden Spring (New York) Limited
 162 East 64th Street
 New York, NY 10065-

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 P.O. Box 71303
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Chris Chuff
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

INVOICE NO.	AD0BC41 AB
FIRM NO.	1211636
INVOICE DATE	12/26/2019

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 Contact Nicole Hou, nhou@depo.com

ABI'S Federal ID No.: 95-4189037

Setting Firm:	Graves Garrett, LLC
Taking Attorney:	Edward D. Greim
Case Name:	Eastern Profit vs. Strategic Vision
Case No.:	18-cv-2185 (JKG)
Claim No.:	
Insurance Co.:	
Insured:	DOL:
Clients Ref.#1:	
Clients Ref.#2:	
Adjuster:	

ITEM	LINE TOTAL
Certified copy of the reporter's transcript of the deposition of Guo Wengui - Volume II, taken 12/4/2019.	\$ 582.00
PAYMENT	- 582.00
BALANCE DUE	\$.00

Payment Terms: Payment is due upon receipt of invoice. Invoices 30 days past due will bear a finance charge of .75% per month. If our company deems it necessary to pursue legal action on invoices, accumulated interest, court costs, and attorney fees may be sought. If you dispute the amount owed pursuant to this job, you must do so in writing within 30 days of the date of the invoice or you will be deemed to have waived the dispute.

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BALANCE DUE	\$.00
INVOICE NO.	AD0BC41 AB
FIRM NO.	1211636

For: Certified copy of the reporter's transcript of the deposition of Guo Wengui - Volume II, taken 12/4/2019.

From: Chris Chuff
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

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Donald J. Detweiler
 Pepper Hamilton LLP
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 Wilmington, DE 19899-1709

INVOICE NO.	1BA29 B
FIRM NO.	1211636
INVOICE DATE	02/20/2020

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ABI'S Federal ID No.: 95-4189037

Setting Firm:	Graves Garrett, LLC
Taking Attorney:	Edward D. Greim
Case Name:	Eastern Profit vs. Strategic Vision
Case No.:	18-cv-2185

Description: MP4 Video Files for the deposition of Guo Wengui taken 12/4/2019.

ITEM	QTY	PRICE	LINE TOTAL
MP4 Video Files	3.75	\$ 50.00	\$ 187.50
Processing and Handling	1	\$ 35.00	\$ 35.00
BALANCE DUE			\$ 222.50

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BALANCE DUE	\$ 222.50
INVOICE NO.	1BA29 B
FIRM NO.	1211636

For: MP4 Video Files for the deposition of Guo Wengui taken 12/4/2019.

From: Donald J. Detweiler
 Pepper Hamilton LLP
 P.O. Box 1709
 Wilmington, DE 19899-1709

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EXHIBIT C

Una Manyee Wilkinson



Invoice Date: 26 April 2021

Invoice No.: GK06521

Client: Golden Spring (New York) Ltd.
800 5th Avenue NY NY 10065

Job Date: 20-22 April, 21

email:



	Description of Job	Rate	Total
1	half days of consecutive interpreting for Eastern Profit Trial on 20 April, 21 from 1230 to 1700	\$600	\$600
2	full days of consecutive interpreting for Eastern Profit Trial on 21 April, 21 from 0930 to 1715 & 22 April, 21 from 0930 to 1730	\$1000	\$2000
1	Lump Sum for local commute (\$53.34+\$72.70+\$70.65+\$57.55+\$58.03+\$60.15)		\$372.42
	-END-		

Total: USD2,972.42-

Payment Details

**Payment is to be made payable to “Una Manyee Wilkinson”
upon presentation of invoice**



Receipts

Original receipt #2



April 20, 2021

Here's your
receipt for
your ride, Una



Total

\$53.34

◆ You earned 106 points on this trip



Receipts

Original receipt #2



April 20, 2021

Here's your
receipt for
your ride, Una



Total

\$72.70

◆ You earned 145 points on this trip



Receipts

April 21, 2021

Here's your
receipt for
your ride, Una



Total

\$57.55

◆ You earned 115 points on this trip

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Receipts

April 21, 2021

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receipt for
your ride, Una



Total

\$70.65

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Receipts

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receipt for
your ride, Una



Total

\$58.03

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L4LPEAS1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x

EASTERN PROFIT CORPORATION
LIMITED,

Plaintiff,

v.

18 CV 2185 (LJL)

STRATEGIC VISION US LLC,

Defendant.

-----x

New York, N.Y.
April 21, 2021
9:37 a.m.

Before:

HON. LEWIS J. LIMAN,

District Judge

APPEARANCES

TROUTMAN PEPPER HAMILTON SANDERS LLP

Attorneys for Plaintiff

BY: CHRISTOPHER B. CHUFF

JOANNA J. CLINE

GRAVES GARRETT LLC

Attorneys for Defendant

BY: EDWARD DEAN GREIM

JENNIFER A. DONNELLI

ALSO PRESENT:

Melissa Francis, Eastern Profit Corporation Limited
J. Michael Waller, Strategic Vision US LLC

UNA WILKINSON, Mandarin Interpreter

LENNY YANG, Check Mandarin Interpreter

JOSHUA KLEIN, Attorney for Mr. Guo

PETRILLO, KLEIN & BOXER, LLP

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YAN PING WANG

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HAN CHUNGUANG [Witness used interpreter]

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Cross By Ms. Donnelly	578
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KWOK HO WAN [Witness used interpreter]

Direct By Ms. Cline	618
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Cross By Mr. Greim	640
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PLAINTIFF EXHIBITS

Exhibit No.	Received
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11	573
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DEFENDANT EXHIBITS

Exhibit No.	Received
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DX56	468
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DX32	469
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DX24 and DX68	469
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DX80	475
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126 and 126B	488
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5	522
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126A	556
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114	630
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L4MKEAS1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

-----x

3 EASTERN PROFIT CORPORATION
4 LIMITED,

Plaintiff,

v.

18 CV 2185 (LJL)

6 STRATEGIC VISION US LLC,

7 Defendant.

8 -----x

9 New York, N.Y.

10 April 22, 2021

9:37 a.m.

11 Before:

12 HON. LEWIS J. LIMAN,

13 District Judge

14 APPEARANCES

15 TROUTMAN PEPPER HAMILTON SANDERS LLP

Attorneys for Plaintiff

16 BY: CHRISTOPHER B. CHUFF

JOANNA J. CLINE

17 GRAVES GARRETT LLC

18 Attorneys for Defendant

19 BY: EDWARD DEAN GREIM

JENNIFER A. DONNELLI

20 ALSO PRESENT:

21 MELISSA FRANCIS, Eastern Profit Corporation Limited

22 J. MICHAEL WALLER, Strategic Vision US LLC

23 UNA WILKINSON, Mandarin Interpreter

LENNY YANG, Check Mandarin Interpreter

24 JOSHUA KLEIN, Attorney for Mr. Guo

25 PETRILLO, KLEIN & BOXER, LLP

INDEX OF EXAMINATION

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GUO WENGUI [Witness used interpreter]	
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SASHA GONG	
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Direct By Mr. Greim	758
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Cross By Ms. Cline	783
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Redirect By Mr. Greim	800
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PLAINTIFF EXHIBITS

Exhibit No.	Received
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52 and 53	753
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70A	754
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PX44, 46, 47 and 50	792
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PX59	803
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DEFENDANT EXHIBITS

Exhibit No.	Received
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48	651
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51	667
--------------	-----

DX76A	736
-----------------	-----

35, 37, and 114	751
---------------------------	-----

123 and 124	802
-----------------------	-----

EXHIBIT D

Reliable Philadelphia
1650 Arch St
Suite 2210
Philadelphia, PA 19103
Phone # 215-563-3363
Fax # 215-563-8839
customerservice@reliable-co.com
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EXHIBIT E

**U.S. District Court
Southern District of New York (Foley Square)
CIVIL DOCKET FOR CASE #: 1:18-cv-02185-LJL**

Eastern Profit Corporation Limited v. Strategic Vision US LLC
Assigned to: Judge Lewis J. Liman
Demand: \$9,999,000
Cause: 28:1332bc Diversity-Breach of Contract

Date Filed: 03/12/2018
Jury Demand: None
Nature of Suit: 190 Contract: Other
Jurisdiction: Diversity

Plaintiff

ABC

TERMINATED: 08/09/2018

Plaintiff

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Date Filed	#	Docket Text
08/09/2018	19	COMPLAINT against Strategic Vision US LLC. (Filing Fee \$ 400.00.)Document filed by Eastern Profit Corporation Limited.(jwh) (***Previously filed under seal in envelope #2, and unsealed on 8/9/2018.**) Modified on 8/14/2018 (jwh). (Entered: 08/14/2018)

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Eastern Profit and Golden Spring
Client/Matter Number: 148183.00002
February 25, 2020

Invoice Number: 11171953
Page 9

SUMMARY OF EXPENSES

	<u>Amount</u>
Data Base Research	1,206.75
Docket Search	5.00
E-Discovery hosting	529.73
Local Transportation	84.75
Messenger Service	99.90
Online Services/Internet Web Sites	234.40
Pacer Services - Court Liaison	10.00
Postage	1.00
Reporting Services	313.44
Travel Expense	(22.00)
TOTAL EXPENSES	\$2,462.97
TOTAL AMOUNT DUE	<u>\$72,506.97</u>